



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 16, 2005

Certified Mail No. 7000 1670 0013 8128 5931

Ross Bennett
Technical Services Manager
Norsun Food Group, Inc.
900 East 3000 North
Sugar City, ID 83448

RE: Facility ID No. 065-00013, Norsun Food Group, Inc., Sugar City
Final Permit Letter

Dear Mr. Bennett:

The Idaho Department of Environmental Quality (DEQ) is issuing revised Permit to Construct (PTC) Number P-050501 for Norsun Food Group, Inc., in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This PTC is effective immediately and replaces PTC No. P-040511, issued to Norsun Food Group, Inc. on January 27, 2005, the terms and conditions of which shall no longer apply. This permit does not release Norsun Food Group, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Aaron Swift of the Idaho Falls Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/SYC/sd
Enclosures

Permit No. P-050501



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050501
FACILITY ID No.: 065-00013
AQCR: 61 **CLASS:** B
SIC: 2037 **ZONE:** 12
UTM COORDINATE (km): 438.9, 4857.3

1. PERMITTEE

Norsun Food Group, Inc.

2. PROJECT

Permit to Construct Revision

3. MAILING ADDRESS

900 East 3000 North

CITY

Sugar City

STATE

ID

ZIP

83448

4. FACILITY CONTACT

Ross Bennett

TITLE

Technical Services Manager

TELEPHONE

208-356-4149 x 119

5. RESPONSIBLE OFFICIAL

Ross Bennett

TITLE

Technical Services Manager

TELEPHONE

208-356-4149 x 119

6. EXACT PLANT LOCATION

903 East 3000 North, Sugar City, Idaho

COUNTY

Madison

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Potato processing plant, included pre-cooked potato products

8. PERMIT AUTHORITY

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: June 16, 2005

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
Btu	British thermal unit
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
gr/dscf	grain (1 lb = 7,000 grains) per dry standard cubic feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
m	meter(s)
MMBtu/hr	million British thermal units per hour
NSPS	New Source Performance Standards
PM	particulate matter
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
T/day	ton per day
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050501

Permittee:	Norsun Food Group, Inc.	Facility ID No. 065-00013	Date Issued:	June 16, 2005
Location:	Sugar City, Idaho			

1. PERMIT SCOPE***Purpose***

- 1.1 This facility was constructed without first obtaining a PTC from DEQ. This PTC contains conditions to limit the facility's potential to emit to protect ambient air quality standards.
- 1.2 This PTC replaces PTC No. P-040511, issued on January 27, 2005, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	<u>Steam Boiler</u>	None
	Ovens: A-line Oven B-line Oven C-line Oven R & D Oven	
	<u>Natural gas-fired space heaters:</u>	
	One line heater (roof mounted) One office heater (pulse) two office 9200 heaters One shop heater One lab heater One boiler room heater two C-line room heaters two A& B line room heaters	
	One steam peeler	
2, 3	Steam Boiler (12.8 MMBtu/hr)	
2, 4	A-line and B-line Ovens	

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (If observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

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Monitoring and Recordkeeping

- 2.11 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

- 2.12 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Idaho Falls Regional Office
900 Skyline, Suite B
Idaho Falls, ID 83402
Phone: (208) 528-2650
Fax: (208) 528-2695

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3. STEAM BOILER**3.1 Process Description**

The natural gas-fired steam boiler was manufactured by Clayton in 1998. The boiler has a rated heat input capacity of 12.8 million British thermal units per hour (MMBtu/hr).

3.2 Emission Control Description

Emissions from the natural gas-fired boiler are uncontrolled.

Emission Limits**3.3 Emission Limit**

The permittee shall not discharge to the atmosphere from the steam boiler particulate matter (PM) in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas in accordance with IDAPA 58.01.01.675.

OPERATING REQUIREMENTS**3.4 Fuel Type**

The steam boiler shall be fueled exclusively on natural gas.

Reporting and Recordkeeping Requirements for Steam Boiler**3.5 Monitoring and Recordkeeping Requirement**

The permittee shall monitor and maintain records of the amounts of natural gas combusted in the steam boiler during each day in accordance with 40 CFR 60 Subpart Dc unless otherwise approved by EPA. The records shall be maintained by the permittee for a period of five years following the date of such record.

3.6 Reporting Requirement

The permittee shall submit notification of the date of construction or reconstruction, and actual startup, as provided by 40 CFR 60.7. This notification shall include the design heat input capacity of the steam boiler and identification of fuels to be combusted in the steam boiler.

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4. A-LINE AND B-LINE OVENS**4.1 Process Description**

The APV A-Line process oven was manufactured by Enersyst in 1989. The oven's model number is Jet Sweep 34. The oven has six burners manufactured by Eclipse (model number RM200); each with a rated heat input capacity of 2.0 MMBtu/hr. Natural gas is used exclusively as the fuel type. Emissions exit through a single stack that is 33.08 feet in height from ground level. The stack diameter is 8 inches x 8 inches.

The Kiremko B-Line process oven was manufactured by Kiremko BV in 1999. The oven's model number is R0755-IMP-99. The oven has eight burners manufactured by Eclipse (model number RM200); each with a rated heat input capacity of 2.0 MMBtu/hr. Natural gas is used exclusively as the fuel type. Emissions exit through a single stack that is 35.0 feet in height from ground level. The stack diameter is 17.5 inches x 31.5 inches.

4.2 Emission Control Description

Emissions from the A-Line and B-Line process ovens are uncontrolled.

Emission Limits**4.3 Emission Limits**

The PM₁₀ emissions from the A-line and B-line process oven stacks shall not exceed any corresponding emissions rate limit listed in Table 4.1.

Table 4.1 A-LINE AND B-LINE OVENS EMISSIONS LIMITS

Source Description	PM ₁₀
	lb/day
A-line oven	2.76
B-line oven	2.76

Operating Requirements**4.4 Throughput Limits**

- The maximum daily throughput of finished potato product to the A-Line process oven shall not exceed 120 tons per day.
- The maximum daily throughput of finished potato product to the B-Line process oven shall not exceed 120 tons per day.

4.5 Fuel Type

The A-Line process oven and the B-Line process oven shall be fueled exclusively on natural gas.

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Monitoring and Recordkeeping Requirements**4.6 Monitoring Requirement**

The permittee shall monitor and record the throughput of finished potato product to the A-Line process oven and the B-Line process oven on a daily basis to demonstrate compliance with Permit Condition 4.4. Throughput shall be recorded as tons. Records of this information shall be maintained in accordance with Permit Condition 2.11.

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5. PERMIT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050501**Permittee:** Norsun Food Group, Inc.**Location:** Sugar City, Idaho**Facility ID No.** 065-00013**Date Issued:**

June 16, 2005

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.